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PAXTON LAGOON

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

DATE: 1 SEP 1983

SUBJECT: ACTION MEMORANDUM - Request for Removal Action at Paxton Lagoon Site,
Chicago, Illinois (Site/Spill ID #GH)FROM: William Simes, On-Scene Coordinator
Emergency and Enforcement Response Section IITO: Basil G. Constantelos, Director
Waste Management Divisioncc: Mary A. Gade, Associate Division Director
Office of Superfund*W. Simes*PURPOSE

The purpose of this memorandum is to obtain your approval to expend up to \$406,000 to mitigate threats to the public health and the environment which are posed by the presence of uncontrolled hazardous wastes located at the Paxton Lagoon Site in Chicago, Illinois. The response actions proposed herein involve:

- 1) The excavation, as well as solidification/neutralization and reburial of corrosive sludges, oils and contaminated soil at the skimmer lagoon;
- 2) Transportation and disposal of deteriorating drums of waste materials.

This is a time critical removal action.

This site is not on the National Priorities List (NPL).

BACKGROUND

The Paxton Avenue Skimmer Lagoon (Paxton Lagoon) site, located in Chicago, Illinois, encompasses an area of approximately 1000 x 500 feet of open field. The property is accessed at 122nd Street and Paxton Avenue at the entrance to Paxton Avenue Landfill. The site is in a predominately industrial area and is bordered by Paxton Landfill on the north, Land & Lakes Landfill to the west, 122nd Street to the south, and Torrence Avenue to the east (Figure 1). Further east of Torrence Avenue is the Calumet River which flows south to 122nd Street and then continues to flow southwest to Lake Calumet directly west of the Land & Lakes Landfill. The topography of the site is rough and consists of large drum berms characterizing the site (Figure 2). The nearest residence is greater than a mile from the lagoons.

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Paxton has been an illegal dump site since the 1950's. In August 1983, the Technical Assistance Team (TAT) conducted a site assessment and recommended immediate removal of the oil in the lagoons and an extent of contamination study of the area (TDD #5-8307-3).

In 1985, John Mathias & Associates, Inc., performed a field investigation at the request of the Illinois Environmental Protection Agency (IEPA) in order to characterize surface and subsurface contamination in the near vicinity of the lagoons. After analysis was completed, Weston Services, Inc. was contracted by the IEPA to provide a mobile incinerator to incinerate the lagoon contents and the surrounding soil. The skimmer lagoon, due to its low pH (less than 2), was excluded from this method of treatment. The action proposed in this memorandum will mitigate threats posed by the oils and sludges in and around the skimmer lagoon and by wastes in deteriorating drums at the site. IEPA is in the process of mobilizing an on-site incinerator to destroy polychlorinated biphenyls (PCBs) on-site. After the completion of the removal activities a cap will be installed by IEPA over the entire site.

THREAT

The threats remaining at the site meet the criteria outlined in the National Contingency Plan (NCP), 40 CFR 300.65 (b)(20), for immediate removal actions as follows:

- 1) Actual or potential exposure to hazardous substances or pollutants or contaminants by nearby populations, animals or food chain;

Potential exposure to humans through contact to corrosive oils and sludges on-site. Large numbers of gulls nest on and adjacent to the lagoon area.

- 2) Hazardous substances or pollutants in drums, tanks or other bulk storage containers that may pose a threat of release;

14 deteriorated drums were found in a trailer on-site. Analysis showed these drums to contain hazardous (flammable and corrosive) materials.

- 3) High levels of hazardous substances or pollutants or contaminants in soil largely at or near the surface that may migrate;

Corrosive oils (pH less than 2) have already contaminated the surface soils surrounding the lagoon.

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4) Threat of fire or explosion.

Samples of the drum materials have flashpoints as low as 85°F, which is below the flammability limit of 140°F.

ENFORCEMENT

See confidential enforcement information in Attachment I.

PROPOSED PROJECT AND COST

The objective of this removal is to mitigate immediate threats to human health and to the environment. The following removal actions are proposed:

- 1) Excavate, neutralize, solidify and reintern the lagoon sludge and soils. Neutralization with lime by-products will neutralize the acid materials, cause the heavy metals to become less soluble and fixate the oils.
- 2) Remove and dispose of the drum material. Neutralize and incinerate off-site.

Cost Estimates

<u>EXTRAMURAL COSTS</u>	<u>PROPOSED CEILING</u>
Cleanup Contractor	\$272,000
Contingency (18%)	<u>49,200</u>
Subtotal	\$321,200
TAT/TES	<u>18,000</u>
Extramural Subtotal	\$339,200
Extramural Contingency (15%)	<u>50,000</u>
EXTRAMURAL TOTAL	\$389,200
<u>INTRAMURAL COSTS</u>	
U.S. EPA Direct Costs [30/hr x (200 Regional hrs) + 20 HQ/hrs]	\$ 6,600
U.S. EPA Indirect Costs [\$51/hr x 200 Regional hrs]	<u>10,200</u>
INTRAMURAL TOTAL	16,800
PROJECT TOTAL	\$406,000

RECOMMENDATION.

Because the conditions at the Paxton Lagoon site in Chicago, Illinois meets the National Contingency Plan, Section 300.65 criteria for a removal action, your approval of this requested estimated project total of \$406,000 of which, up to 371,200 (\$272,000 plus \$49,200 plus \$50,000) is for extramural cleanup contractor costs.

APPROVED:

[Signature]
Director, Waste Management Division

DATE:

[Signature]

DISAPPROVED:

Director, Waste Management Division

DATE:

bcc: D. Ouderkerk, OS-210
M. Elam, 5CS-TUB-3
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O. Warnsley, RP/CRU, 5HS-12
T. Lesser, 5FA-14
W. Simes, 5HS-11
A. Anderson, 5MA-14
EERB Read File
EERB Delivery Order File
EERB Site File

ATTACHMENT 1
CONFIDENTIAL ENFORCEMENT INFORMATION

Redacted-Information not relevant to selection of removal action.

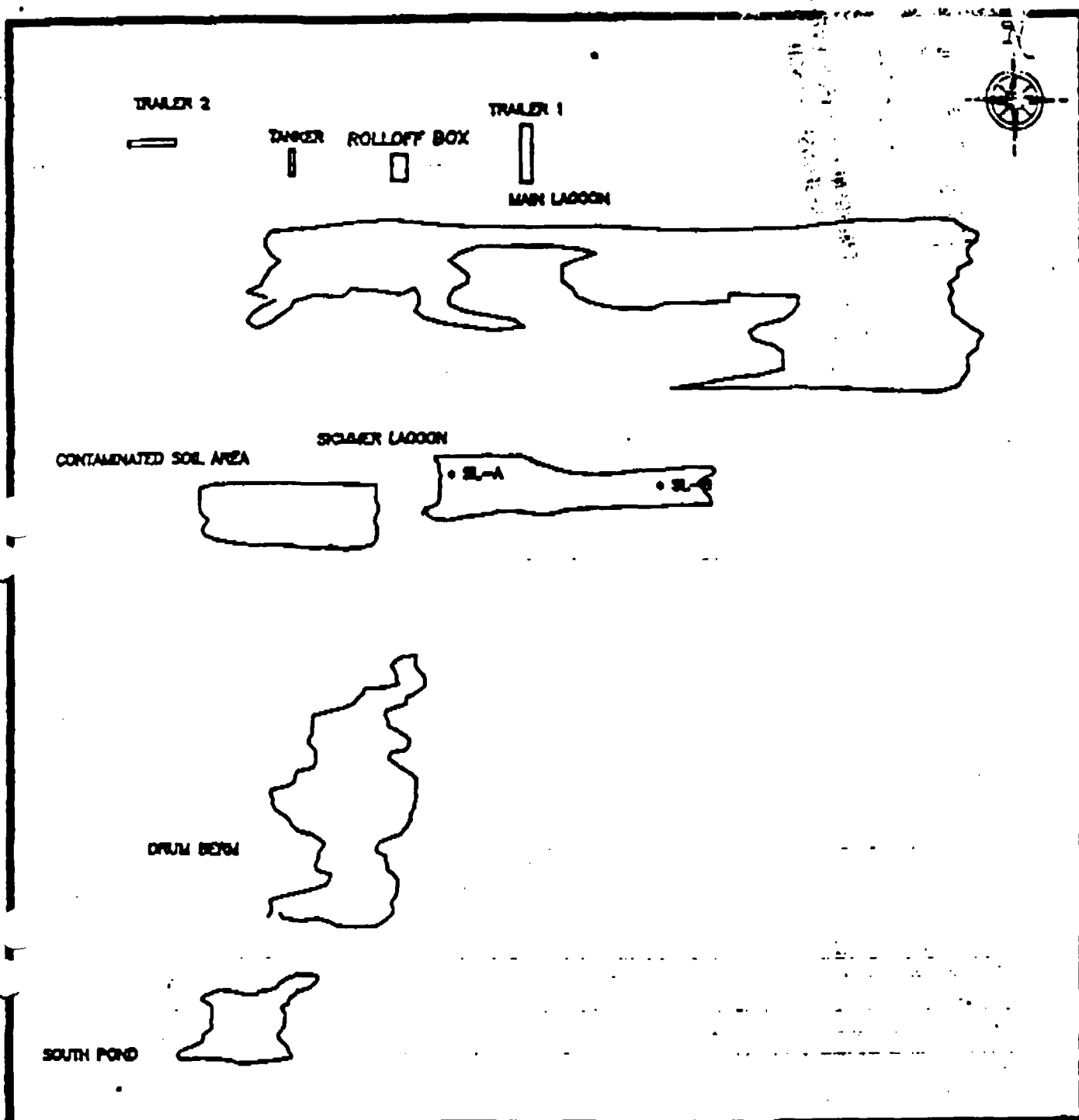


FIGURE 2
SITE MAP
PAXTON AVENUE LAGOON
CHICAGO, ILLINIOS
NOT TO SCALE

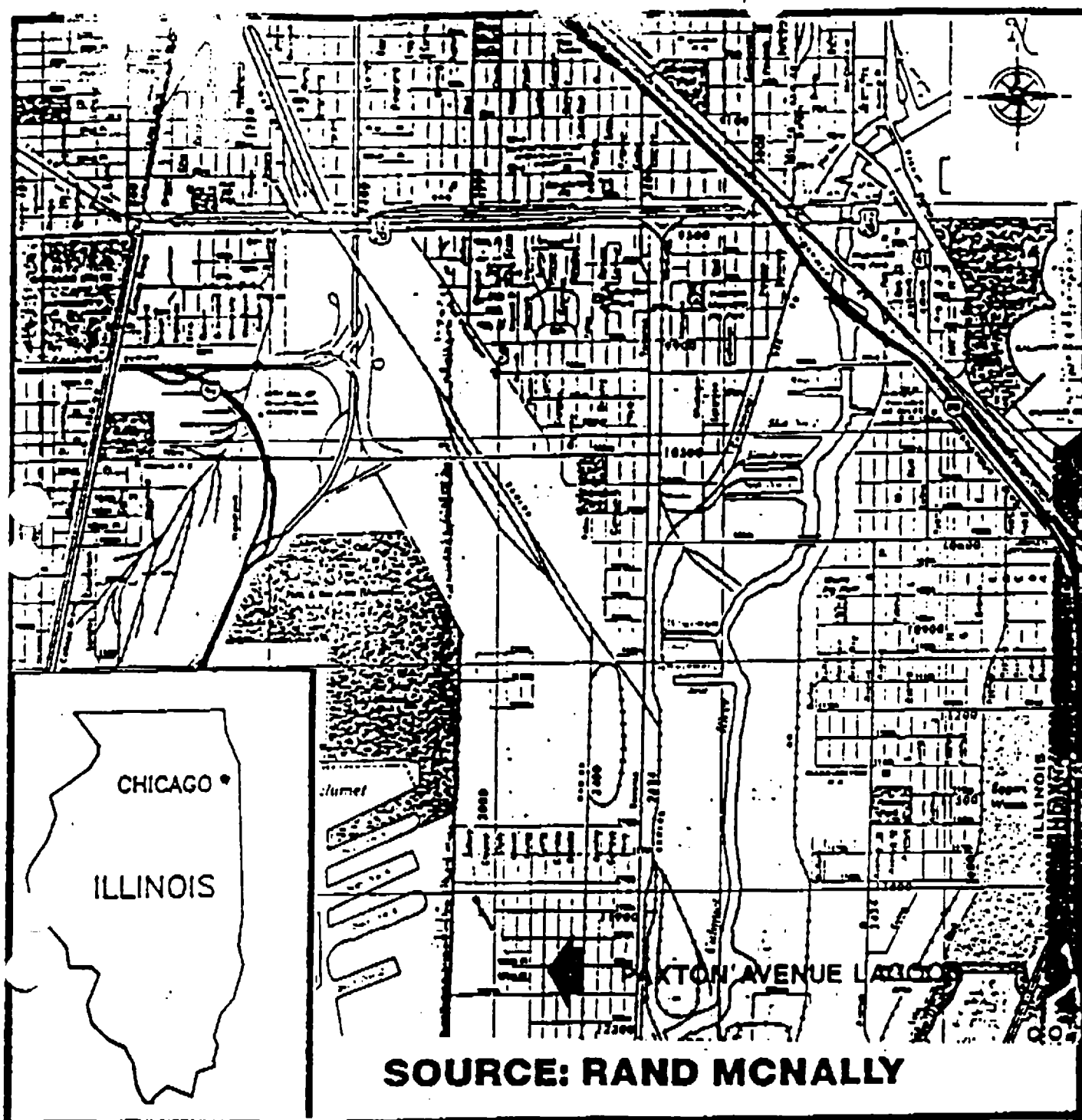


FIGURE 1
SITE LOCATION MAP
PAXTON AVENUE LAGOON
CHICAGO, ILLINOIS
SCALE 1 INCH=.67 MILES